

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BING LI, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

AETERNA ZENTARIS INC., DAVID A.
DODD, JUERGEN ENGEL, and PAUL
BLAKE,

Defendants.

Case No. 3:14-cv-07081-PGS-TJB

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN
OF ALLOCATION**

Motion Day: February 16, 2021

Hon. Peter G. Sheridan

PLEASE TAKE NOTICE that pursuant to the Court’s Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement (ECF No. 174), on February 16, 2021, at 11:00 a.m., Class Representatives Gregory Vizirgianakis, Phong Thomas Dinh, and Jamshid Khodavandi (collectively, “Lead Plaintiffs”)¹ will, and hereby do, apply to the Honorable Peter G. Sheridan, United States District Judge of the United States District Court for the District of New Jersey, via telephone conference (Toll Free Dial-In Number: 844-891-8300; Conference ID: 817 247 369#), for entry of an Order: (i) granting final approval of the Settlement in the above-captioned action on the term set forth in the Stipulation; and (ii) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.

In support of this motion, Lead Plaintiffs rely on the concurrently filed Memorandum of Law; Declaration of Laurence Rosen in Support of (I) Lead Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and records on file in this Action; and other such matters as the Court may consider.

Dated: January 12, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen

Laurence M. Rosen
One Gateway Center
Suite 2600
Newark, NJ 07102
Tel: (973) 313-1887
Fax: (973) 833-0399

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated July 22, 2020 (the “Stipulation,” ECF No. 169-1).

Yu Shi
275 Madison Ave, 40th Floor
New York, NY 10016
Tel: (212) 686-1060
Fax: (212) 202-3827

GLANCY PRONGAY & MURRAY LLP

Kara M. Wolke
Kevin F. Ruf
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Tel: (310) 201-9150
Fax: (310) 201-9160

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO**

James E. Cecchi
Donald A. Ecklund
5 Becker Farm Road
Roseland, New Jersey 07068
Tel: (973) 994-1700
Fax: (973) 994-1744

*Counsel for Lead Plaintiffs and the Certified
Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 2021 a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen
Laurence Rosen